

GARRETT R. CHASE, ESQ.
Nevada Bar No. 14498
SHUMWAY VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770
Facsimile: (702) 478-7779
Email: garrett@shumwayvan.com
Attorney for MDM Consultants, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

INVEST VEGAS LLC; MDM
CONSULTANTS, INC.

Plaintiff,

v.

21ST MORTGAGE CORPORATION; CAL-
WESTERN RECONVEYANCE
CORPORATION; NATIONAL CITY
MORTGAGE, A DIVISION OF
NATIONAL CITY BANK OF INDIANA;
COMMONWEALTH LAND TITLE
INSURANCE COMPANY; ONTARIO
CONDOMINIUM RENTAL SERVICES,
INC; HARLEE S. CARTER; LANA
CARTER; DARREN C. BOUTON; DOES I
through X, inclusive; ROE BUSINESS
ENTITIES I through X inclusive.

Defendants.

Case No.: 2:15-cv-00644-VCF

STIPULATION AND ORDER TO EXTEND
PRE-TRIAL ORDER DEADLINE AND
CONTINUE TRIAL

(SECOND REQUEST)

Plaintiff MDM Consultants (“Plaintiff”) and Defendant 21st Mortgage Corporation (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate and agree that the pre-trial deadlines in this matter be continued by 45 days to allow for the Parties to discuss potential resolution of this matter by participation through the mediation process. Specifically, the Parties are requesting that the current deadline to submit the Joint Pretrial Order, currently scheduled for June 4, 2021, be extended to July 19, 2021. Though not yet scheduled, the Parties also request that the trial in this matter be continued to a time

1 consistent with the proposed Joint Pretrial Order deadline. This is the second stipulation of the
2 Parties to continue these deadlines, and the time of trial in this matter. The relevant timelines have
3 not lapsed, this request will allow the parties to participate in mutually agreed upon mediation.
4 Further, this Stipulation complies with the relevant provisions of LR IA 6-1(a) and LR 26-4.
5 Accordingly, the Parties propose that the deadline for the Joint Pretrial Order be continued until
6 July 19, 2021 and the trial in this matter to be continued for 45 days.

7
8 DATED this 3rd day of June, 2021.

DATED this 3rd day of June, 2021.

9
10 **SHUMWAY VAN**

HUTCHINSON & STEFFEN, PLLC

11 By: /s/ Garrett R. Chase
12 GARRETT R. CHASE, ESQ.
13 Nevada Bar No. 14498
14 8985 S. Eastern Ave., Suite 100
15 Las Vegas, NV 89123
16 *Attorney for MDM Consultants, Inc.*

By: /s/ Michael R. Brooks
MICHAEL R. BROOKS, ESQ.
Nevada Bar No. 7287
8985 S. Eastern Ave., Suite 100
Las Vegas, NV 89123
Attorney for 21st Mortgage Corporation

SHUMWAY • VAN
8985 South Eastern Avenue, Suite 100
Las Vegas, Nevada 89123
Telephone: (702) 478-7770 Facsimile: (702) 478-7779

ORDER

Upon Stipulation of the parties, and for good cause appearing therefore, IT IS HEREBY ORDERED as follows:

a. Deadline to for Joint Pretrial Order: July 19, 2021.

IT IS SO ORDERED.

Dated this 8th day of June, 2021.



Cam Ferenbach
United States Magistrate Judge

Respectfully Submitted by:

SHUMWAY VAN

BY: /s/ Garrett R. Chase
GARRETT R. CHASE, ESQ.
Nevada Bar No. 14498
8985 South Eastern Avenue, Suite 100
Las Vegas, NV 89123
Attorney for MDM Consultants, Inc.